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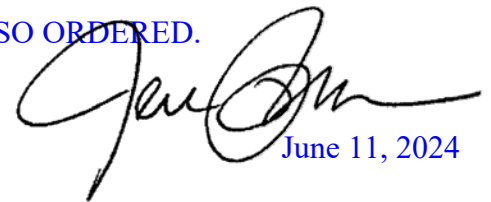
June 11, 2024

VIA ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. The initial pretrial conference scheduled for June 18, 2024, is hereby ADJOURNED to **July 23, 2024, at 9:00 a.m.** The Clerk of Court is directed to terminate ECF No. 24.

SO ORDERED.



June 11, 2024

RE: *Liberty Mutual Ins. Co. v. Kuehne + Nagel Inc.*
Case No. 23-cv-10511

Dear Judge Furman:

We represent the plaintiff in the above referenced action. We write jointly with counsel for defendant Kuehne + Nagel Inc. d/b/a Blue Anchor America Line ("K+N") to respectfully request a 30-day adjournment of the initial scheduling conference currently scheduled for June 18, 2024.

The reason for the requested adjournment is to provide additional time for Third Party Defendant Hapag-Lloyd Aktiengesellschaft ("Hapag") to appear in this action. K+N filed a Third-Party Complaint against Hapag on February 20, 2024 [ECF Doc. No. 12]. Hapag executed a waiver of service on May 31, 2024 [ECF Doc. No. 22] and its answer is due by July 1, 2024. Therefore, additional time is needed in order for Hapag to answer and appear in this action.

This is the third request for an adjournment of the initial scheduling conference in this matter. The parties previously requested an extension of time for K+N to answer the complaint (ECF Doc. No. 9) and two prior adjournments of the initial scheduling conference (ECF Doc. Nos. 15, 18), which were granted (ECF Doc. Nos. 10, 16, 20).

We thank the Court for its time and consideration of this matter. Please do not hesitate to contact the undersigned with any questions or comments.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By:

A handwritten signature in dark ink, appearing to be 'Val Wamser', with a long horizontal flourish extending to the right.

Val Wamser

CC:

All Counsel of Record via ECF